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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

WESTERN WATERSHEDS PROJECT;)
NATIONAL PRESS PHOTOGRAPHERS)
ASSOCIATION; and NATURAL RESOURCES)
DEFENSE COUNCIL,)
Plaintiffs,)

v.)

Civil No. 15-cv-169-S

BRIDGET HILL, in her official capacity)
as Attorney General of Wyoming; TODD)
PARFITT, in his official capacity as Director)
of the Wyoming Department of Environmental)
Quality; PATRICK J. LEBRUN, in his official)
capacity as County Attorney of Fremont)
County, Wyoming; JOSHUA SMITH, in his)
official capacity as County Attorney of)
Lincoln County, Wyoming; and)
MICHAEL CROSSON, in his official capacity)
as County and Prosecuting Attorney of Sublette)
County, Wyoming,)
Defendants.)

**JOINT MOTION TO SET A BRIEFING SCHEDULE FOR PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES AND EXPENSES**

The Court entered a final judgment for Plaintiffs on October 29, 2018. Dkt. Nos. 113 & 114. On November 11, 2018, the parties jointly moved for an extension of the deadline for Plaintiffs to file their petition for fees and costs up to and including January 31, 2019. Dkt. No. 115. In that motion, the parties noted that they may return to the Court to seek additional time. The Court granted that motion. Dkt. No. 116. The parties sought, and the Court granted, a further extension up to and including March 31, 2019, to either notify the court that a settlement has been reached, or for Plaintiffs to file their petition for costs and fees. Dkt. No. 118. The parties now seek an order extending the motion deadline and setting a briefing schedule for Plaintiffs' Motion for Attorneys' Fees and Expenses.

In support of this motion and in accordance with Local Rule 54.3, the parties state as follows:

1. Plaintiffs began discussing their costs and fees with Defendants Bridget Hill and Todd Parfitt (the State Defendants) on December 12, 2018. Plaintiffs have provided the State Defendants an accounting of their fees and costs, including details regarding hourly rates and contemporaneous time sheets detailing their hours and activities.

2. The State Defendants made a counter-offer on February 1, 2019. In an email dated February 4, 2019, Plaintiffs sought clarification from the State Defendants regarding the counter-offer. The State Defendants responded on February 5, 2019. Plaintiffs then sought a further clarification regarding the State Defendants' offer on February 6, 2019, and the State Defendants responded on February 8, 2019.

3. Plaintiffs provided the State Defendants a revised offer on March 5, 2019. The State Defendants rejected that offer on March 15, 2019, and did not make a further counter-offer.

4. The parties have been unable to reach an agreement on attorneys' fees and costs.

To accommodate the parties' counsel's obligations in other litigation, the parties respectfully request that the Court enter the following briefing schedule:

- a. Plaintiffs will file their Motion for Attorneys' Fees and Expenses by April 16, 2019.
- b. Defendants will file their response to Plaintiffs' Motion by May 8, 2019.
- c. Plaintiffs will file their reply in support of their Motion by May 23, 2019.

Submitted this 27th day of March, 2019.

/s/ David S. Muraskin

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CERTIFICATE OF SERVICE

I certify that on the 27th day of March, 2019, I electronically filed the foregoing with the Clerk of the U.S. District Court of Wyoming using the CM/ECF system which sent a notice of electronic filing to all counsel of record.

/s/ Michael E. Wall

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